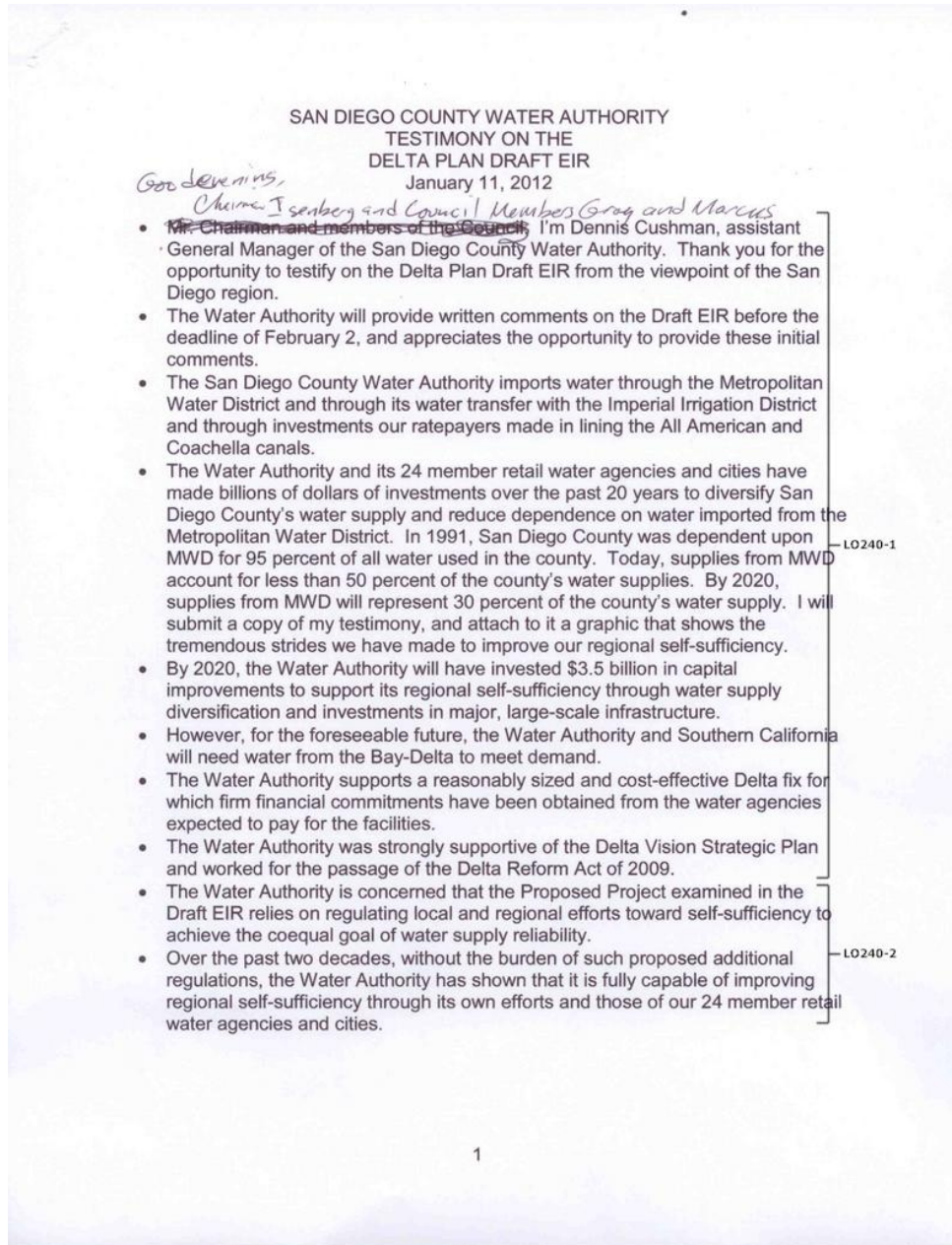


LO240 Cathleen Peroni



Response to comment LO240-1

Comment noted.

Response to comment LO240-2

Comment noted.

- What the Water Authority sees as achievement of the coequal goal of improving water supply reliability would be the restoration of water supplies that have been restricted under the Endangered Species Act, through the removal of threats to the listed species and recovery of those species. LO240-3
- We do not see anything in the Proposed Project that achieves this goal. Rather, the Proposed Project seems to emphasize adjusting to the restrictions on water supply. LO240-4
- The Water Authority is also concerned with the emphasis on water flows through the Delta as the primary means of achieving the coequal goal of ecosystem restoration. While some changes to seasonal flows may be necessary to restore fish populations, there are many other stressors on fish that are not adequately addressed in the Delta Plan or the Draft EIR. LO240-5
- With respect to the Draft EIR, the document does not *define* achievement of the coequal goals. Without such definition, it is impossible to fully evaluate the Proposed Project and alternatives. LO240-6
- The Draft EIR asserts that the Proposed Project will achieve the coequal goals and that the alternatives will not, but the Draft EIR does not say *how* it will achieve the coequal goals, nor does it define what achievement of the coequal goals consists of. LO240-7
- At a minimum, the Draft EIR must define and quantify achievement of the coequal goals and evaluate the Proposed Project and project alternatives against that definition. LO240-8
- While the Draft EIR evaluates project alternatives against the Proposed Project, it does not set out the alternatives in full, as they were submitted to the Council. The alternatives are merely paraphrased in a manner that does not accurately depict the proposals and prejudices the reader against the alternatives. LO240-9
- The alternatives should be laid out, *in full*, in the Draft EIR and evaluated fairly against the Proposed Project and the definitions of achievement of the coequal goals. LO240-10
- Other than a recommendation that the BDCP be completed on time, the Draft EIR and the Proposed Project do not include a process for moving forward with a project to build a dual conveyance system. There is no contingency plan if the BDCP fails to meet the standards of an NCCP, other than to reduce local demand for Delta supplies.
- On the whole, the Proposed Project is only different from the No-project Alternative in that it adds a layer of regulation to local and regional efforts to achieve self-sufficiency – regulation that is unwarranted and unneeded.
- Thank you.

Response to comment LO240-3

This is a comment on the project, not on the EIR.

Response to comment LO240-4

Please refer to Master Response 5.

Response to comment LO240-5

Please refer to Master Response 3.

Response to comment LO240-6

Please refer to Master Response 3.

Response to comment LO240-7

Please refer to Master Response 3.

Response to comment LO240-8

The policies and recommendations of the Fifth Staff Draft Delta Plan and the alternatives are reproduced in Appendix C of the DEIR. The Final Draft Delta Plan policies and recommendations are reproduced in Appendix C of the RDEIR, and changes from the policies and recommendations in the Fifth Staff Draft Delta Plan are shown by underlining and strikeout.

Response to comment LO240-9

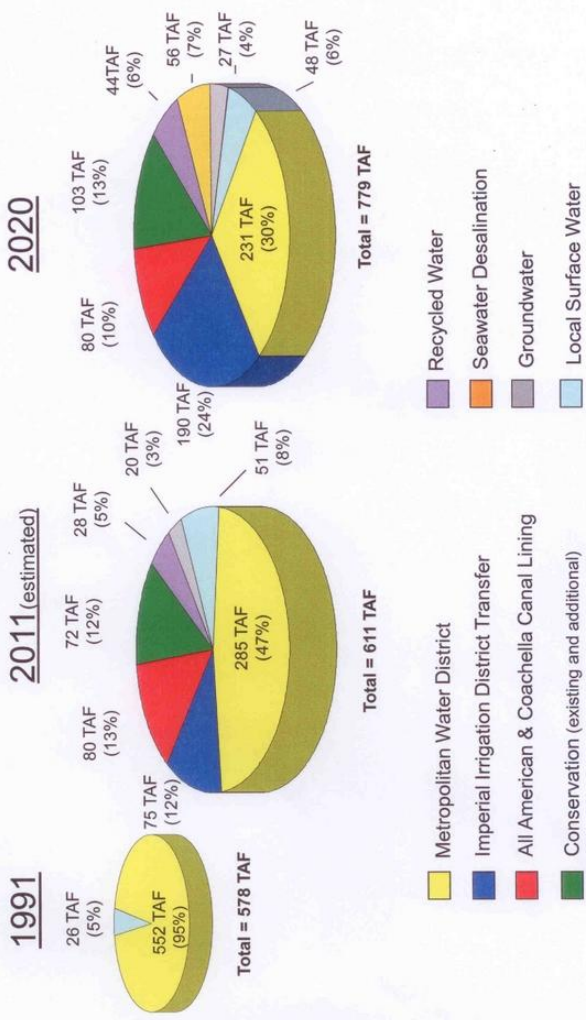
This is a comment on the project, not on the EIR. Please refer to Master Response 1.

Response to comment LO240-10

The proposed Delta Plan contains policies and recommendations that will affect covered actions by requiring them to be consistent with the Delta Plan and help implement the Delta Reform Act. As described on page 2A-67 and Section 2.3.2 of the Draft Program EIR and as required by CEQA Guidelines section 15126.6(e), the No Project Alternative, consists of the environment if no Delta Plan is adopted and assumes that existing relevant plans and policies would continue, including reasonably foreseeable modified or new plans that are currently being analyzed for adoption or are currently required to be adopted. The No Project

Alternative also includes physical activities and projects that are permitted and funded at this time. The analysis of the No Project Alternative in Sections 3 through 21 of the DEIR and RDEIR assumes all of these conditions. The No Project Alternative does not include future projects that would require future studies, environmental documentation, or permitting, including projects encouraged by the proposed Delta Plan or one of the alternatives.

Improving Regional Self-Sufficiency San Diego County Water Supply Diversification 1991-2020



No comments

- n/a -